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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 13, 1992

Ms. Donna Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554

ORIGINAL
FILE

Re: The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC
Docket No. 92-105.

Dear Ms. Searcy,

Enclosed herewith for filing are the original and nine (9) copies of MCI Telecommunications Corporation's Reply Comments regarding the above captioned proceeding.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Reply Comments furnished for such purpose and remit same to the bearer.

Yours truly,

Carol Schultz
Its Attorney

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:
The Use of N11 Codes and Other
Abbreviated Dialing Arrangements

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CC Docket No. 92-105

REPLY COMMENTS

MCI Communications Corporation (MCI) hereby respectfully submits its reply to several of the comments on the Commission's Notice of Proposed Rulemaking in the above captioned docket. N11 codes have substantial benefits over other numbers for access to services. To state the obvious, three digits are easier to remember, easier to dial, faster and quicker than seven or ten digit dialing. Moreover, customers are familiar with three digit dialing as they have used the relatively ubiquitous 911 and 411 services for many years. These valuable N11 resources should not lie idle; nor should they be used solely by LECs for their own commercial or internal services, pending nebulous future events.

N11 codes are even more valuable when used consistently. The ability to remember N11 codes, as well as the ease of using N11 codes while travelling, will certainly decline should multiple uses be allowed on any one N11 code.¹ Thus, priority should be given to national or ubiquitous uses to preserve the inherent value of N11 abbreviated dialing. Code allocations should also be nondiscriminatory, on a first-come, first served basis considering requests that predate the adoption of this order. The Commission should establish a separate proceeding on an expedited basis to require the LECs to develop abbreviated dialing methods to accomodate a larger number of users' needs.

I. N11 CODES SHOULD NOT BE WASTED PENDING NEBULOUS FUTURE USES OR DEVELOPMENT OF ALTERNATIVES FOR ABBREVIATED DIALING

Several commenters recommend against allocating individual N11 codes to information

¹ The ease of remembering N11 codes may also decrease as the absolute number of N11 codes, or even the number of three-digit dialing codes in service increases.

service providers (ISPs) or other commercial uses. These arguments are conflicting and in the case of the LECs, self-serving.² First, several LECs and Bellcore recommend that the N11 codes be reserved pending "public interest" uses, rather than utilized now for commercial services.³ However, the only example to date of a "public interest" use that has anywhere close to ubiquitous acceptance is the emergency services code 911. Although easy access to emergency services has significant inherent appeal, it took many years and action by numerous government agencies to implement it throughout the country. Still, it is available to only 75 percent of the population of the United States.⁴ The probability of another such effort to activate a second ubiquitous "public interest" code is extremely remote.

Some commenters erroneously categorize current LEC commercial or internal uses, specifically 411, 611 and 811 assigned by Bellcore as "public interest" uses, and on that basis ask that these uses be preserved by the Commission.⁵ The Commission should make an independent determination as to the public benefit of retaining the uses of each of these codes, rather than deferring to discriminatory historical assignments.⁶ LECs should also be prohibited from expanding their own exclusive use of 411 to information services. Allowing the LECs to leverage their discriminatory advantage would be in direct contravention of the Commission's

² Bellcore at 2, Ameritech at Section II, Bell Atlantic at 1, NYNEX at Section II, Pacific and Nevada Bell at Section I, SWBT at 1, US West at 9, USTA at 26, GTE at 1-2, Centel at 1, SNET at Section II, Rochester at 2-3.

³ See, Bellcore at 2, Ameritech at Section II.A.2, NYNEX at Section II, Pacific and Nevada Bell at Section I.A., US West at III.B.

⁴ Statistic provided by the National Emergency Numbering Association. See, also, "Rescuing 911," Forbes, March 2, 1992, p. 103 ("Two-thirds of the country has some form of 911 service connecting callers to an emergency agency.")

⁵ See, e.g., BellSouth at 4, GTE at 2-4, Centel at 2.

⁶ The LECs derive substantial amounts of revenue from their monopoly on the use of 411 for directory assistance. The use of 611 and 811 for repair and customer services are also beneficial to the LECs' business. No LEC customers have been given access to N11 codes for their respective customer service or repair services, or for any other use.

Comparably Efficient Interconnection policy⁷. MCI also agrees with commenters who explain that there is no reason to retain any of the uses for N11 codes other than 911 and 411,⁸ as the uses are not pervasive, nor will undue hardship result from changing the method of accessing the LEC services.

Second, several commenters claim that N11 codes should not be allocated because they may be needed for future NPAs.⁹ The LECs have been reluctant to commit the resources required to expand the number of NPAs in a timely manner, and have in fact contributed to the early depletion of NPAs through inefficient NXX assignment.¹⁰ These same LECs should not be allowed to stockpile N11 resources for their own use claiming that they may be necessary for use as a future NPA. In any case, their concern conflicts with other commenters' statements that the need to use N11s for NPAs is unlikely.¹¹ In fact, Bellcore has indicated to the industry that advancing the date for implementation of interchangeable NPAs from July 1, 1995 to January 1, 1995, combined with prudent code conservation principles in the central office (CO) code guidelines, will alleviate the need to use N11 codes as NPAs.¹²

⁷ See, Amendment of Sections 64.702 of the Commission's Rules and Regulations, 104 FCC 2d 958.

⁸ See, e.g., Mobile Connections, Inc. at 3, LO/AD Communications at 2.

⁹ See, e.g., Bellcore at 6, US West at 7-9.

¹⁰ In its Comments in response to the Commission's Public Notice of October 18, 1991, on the National Association of Regulatory Utility Commissioners (NARUC) Petition requesting that the Commission establish a Notice of Inquiry (NOI) to seek information regarding the administration of the NANP, MCI commented on the failure of Bellcore to establish NXX guidelines and reluctance of the RBOCs to implement interchangeable NPAs in a timely manner. These comments are incorporated herein by reference.

¹¹ See, e.g., BellSouth at 5.

¹² Presentation given to Industry Carriers Compatibility Forum (ICCF) 24 by Ronald R. Conners, Director NANP.

Other commenters explain that N11 codes may be unacceptable for use as NPAs¹³ and that an N11 use as an NPA is not likely to conflict with its use as an access code for ISPs.¹⁴

There is also conflicting opinion on the difficulties involved in reclaiming codes, should that become necessary. Some expressed concern that reclamation will be complicated or litigious,¹⁵ while others commit to the prompt return of such codes if necessary.¹⁶ Virtually every N11 code is currently either idle, or used for the LECs' commercial services or internal purposes.¹⁷ Some LECs believe that they should be permitted to expand these uses to information or other services.¹⁸ Obviously it is the LECs themselves who do not want to give up the use of these codes, and have generally refused to allocate N11 codes to others upon reasonable request.¹⁹ Arguing that the codes be held in "reserve" simply introduces delay and avoids the allocation of codes to anyone except the LECs themselves. Thus, the

¹³ BellSouth states that "some switches may require generic modification before [the use of N11 as an NPA] could occur. There is some question as to whether such switch modifications could be developed and deployed in sufficient time to provide meaningful relief prior to implementation of interchangeable NPAs in 1995." BellSouth at 5-6. US West states that "[t]he use of N11 numbers as area codes raises technical issues. Judgements will need to be made concerning whether, and at what cost, LEC end office switches can accommodate a geographic area code of the form N11." US West at 8.

¹⁴ BellSouth states that "the extent to which a dialing conflict exists when a N11 code is used simultaneously for a NPA and for local abbreviated dialing services may be limited to only a few geographic areas." BellSouth at 6.

¹⁵ See, e.g., Belcore at 5, Ameritech at Section II.C.4 and IV.B., Rochester at 5.

¹⁶ See, e.g., Mobile Connections Inc. at 3-4.

¹⁷ The NANPA recently completed a survey of the industry on the use of codes or prefixes to develop a response to the U.S. International Telegraph and Telephone Consultative committee (CCITT) Ad Hoc Group on the Universal Personal Telecommunications (UPT) Prefix. Responses verify that the uses of N11 today are primarily for LEC commercial or internal purposes.

¹⁸ See, e.g., BellSouth at 3, Centel at 5-6.

¹⁹ See, e.g., Letter from Werner K. Hartenberger, Attorney for Cox Enterprises, Inc. to The Honorable Alfred C. Sikes, Chairman, Federal Communications Commission, dated March 27, 1992. See, also, Datatrex at 2, PBS/The Print Group Inc. at 1. MCI has requested N11 codes from the RBOCs and several other LECs and has yet to be allocated one code.

Commission should reject these objections to the assignment of N11 codes.

Third, the concern that allocating N11 codes to ISPs will result in an unfair competitive advantage to some ISPs seems disingenuous on the part of LECs.²⁰ In fact it is even more unfair to allow the LECs to continue to retain codes acquired through historical, competitively advantageous allocations by Bellcore. In any event, there is no doctrine that prevents codes, which are integral to the provision of service, from being allocated in a nondiscriminatory manner, even if scarce resources would result in competitive advantage for those that acquired such codes.²¹

MCI favors the Commission requiring the LECs to implement technology to allow equal access to abbreviated dialing in the long-term.²² However, the Commission should not reserve N11 codes pending exploration of alternatives for ISPs. The currently available alternatives to N11 codes are inferior because they do not provide for abbreviated dialing. For example, Ameritech and USTA suggests that the service access code (SAC) 900 and the 976 central code (C.O.) code are sufficient numbering resources to dedicate to ISPs, but these alternatives involve clearly inferior ten-digit and seven-digit dialing.²³ Additionally, Alternative Weekly Newspapers, et. al. suggests that 976 access and billing and collection service may

²⁰ See, e.g., Pacific Bell and Nevada Bell at 7-8, GTE at 7. Other commenters are concerned that assignment would be detrimental to competition. See, e.g., Ad Hoc at Section II.B.

²¹ Otherwise, AT&T would never have been able to purchase 800 access, using codes that were not yet available to its competitors. Nor would customers be allowed to obtain "vanity" 800 numbers.

²² Several commenters urge the Commission to encourage the development of this technology. See, e.g., Bellcore at 9, BT North America Inc. at 7, AdHoc at Section III (recommends a presubscription to ISP services).

²³ NYNEX suggests the use of 540-XXXX, 550-XXXX, 976-XXXX or 900-XXX-XXXX. NYNEX at 4-5. Pacific Bell and Nevada Bell suggest 555-XXXX and N11-XXXX or an N11 gateway. Pacific Bell and Nevada Bell at 19. US West suggests that 555-XXXX or N11-XXXX be used once technically feasible. US West at Section II.B.

soon be unavailable from US West.²⁴ Clearly, the potential withdrawal of service also makes the current 976 alternative less desirable than N11 codes.

Proposed future alternatives using abbreviated dialing are likely to be very time-consuming to implement. For example, Bellcore suggests that the Commission encourage industry development of alternative abbreviated dialing capabilities (e.g. XX# or XXX #)²⁵ and NYNEX suggests that the ICCF consider the use of vertical service codes, such as *XX, *XXX, and XXX#.²⁶ Ameritech cites numerous problems with using an NXX# dialing plan, but suggests that the Industry Information Liaison Committee (IILC) is the appropriate forum for resolution.²⁷ Some commenters suggest that the Commission should defer to Bellcore or the industry fora for numbering decisions.²⁸ However, the Commission cannot delegate such authority to a private party, especially one owned by the RBOCs.²⁹ In any case, as BT North America pointed out, solutions have been pending in the IILC for over three years with no resolution.³⁰ Meanwhile, without Commission intervention, the LECs will simply retain all abbreviated dialing for their own use to the disadvantage of their competitors and customers.

It is time to prohibit the LECs' completely unjustified and discriminatory "dog-in-the-

²⁴ Alternative Weekly Newspapers, et. al. at 3.

²⁵ Bellcore at 9.

²⁶ NYNEX at 7-8.

²⁷ Ameritech at Section III. Bell Atlantic points out that the * or # options would not be available from rotary phone. Bell Atlantic at 5-6.

²⁸ See, e.g., Bellcore at 9.

²⁹ Cox at Section V.

³⁰ BT North America at 2-4. In fact, the LECs generally assert that there may be numerous technical and implementation issues that must be resolved prior to adoption of any of these solutions. See, e.g., Pacific Bell and Nevada Bell at 13-15. Only Bell Atlantic attached an availability date of 1993 for its N11 "gateway" alternative. Bell Atlantic at 2. The other alternatives may take even longer to implement.

manger" approach to allocation of valuable numbering resources. The LECs have no incentive to implement technology to make efficient numbering resources available to those who need them. In fact, the LECs are motivated to delay implementing any technology that would provide reasonable access to what they perceive are their future competitors. The commenting parties who filed in this docket clearly suggest that reasonably requested abbreviated dialing will not be readily available to competitors anytime in the foreseeable future if it is left up to the LECs or Bellcore.³¹ N11 code allocation should not be delayed, but MCI requests that the Commission initiate a proceeding to require the LECs to implement a plan for long-term widespread availability of efficient numbering resources.

II. THE COMMISSION SHOULD REQUIRE THAT N11 CODES BE ASSIGNED CONSISTENTLY NATIONWIDE ON A FIRST-COME, FIRST-SERVED BASIS

Several parties claim that the states have jurisdiction over local numbering such as N11. This is clearly in conflict with the decision in the Cellular Interconnection Proceeding, that "state regulation of this national resource [numbering codes] could substantially affect interstate communications by disrupting the uniformity of the NANP."³² MCI is concerned that characterization of N11, a valuable national resource, as a "local service" may permit burdensome restrictions on the numbering plans for nationally deployed services. MCI therefore requests that the Commission also order the prompt, nondiscriminatory allocation of N11 codes as outlined below.

N11 numbers should be allocated in a way that preserves their intrinsic value as a numbering resource. The ability to remember N11 codes, as well as the ease of using N11

³¹ See, e.g., BT North America at 7.

³² Cellular Interconnection Proceeding, 2 FCC Rcd. at 2912.

codes while travelling are enhanced by ubiquitous or nationwide uses.³³ Thus, Cox is simply incorrect in asserting that there are "no other uses [other than local] of N11 codes that better serve the public interest."³⁴

Cox tries to bolster its position by alleging without documentation that national uses would require more reprogramming or reengineering of every switch in the United States.³⁵ In fact, the BOC Notes on the Network, cited by Cox to support its position that switches are capable of locally routing N11 calls, also indicates that sometimes code conversion is used today to convert 911 to seven or ten digit telephone numbers for routing.³⁶ The effort to implement access using N11 codes is more dependent upon how calls are accepted by the customer rather than the local or national nature of the service. This is consistent with the LECs' statements that it may require technical modifications or costs to provide access to N11 codes for either local or national use,³⁷ and Pacific Bell and Nevada Bell's explanation that the implementation issues will depend upon the service provided.³⁸ Thus, Cox's arguments that local use would be easier to implement are not substantiated factually, and should be ignored.

Cox also submits that N11 codes will be used by more service providers if they are available for local use.³⁹ Although the same number of codes potentially could be distributed

³³ Some commenters specifically agreed that nationally uniform uses should be given priority. See, e.g., US Sprint at 6. Other commenters agree that the assignment to varied local uses will cause confusion and diminish the value of N11 codes. See, e.g., US West at 5-6, Centel at 3, NYNEX at 6.

³⁴ Cox at 6.

³⁵ Cox at 5.

³⁶ BOC Notes on the LEC Networks -1990, Section 4.1.3 (1991), Cox at Exhibit 1.

³⁷ See, e.g., USTA at 23, GTE at 4-5.

³⁸ Pacific Bell and Nevada Bell at 15-16.

³⁹ Cox at 4.

among more users, there is no clear public benefit from this result. Essentially, each of the codes will still be available to only a limited number of competitors in each locality. The public will still have access to only a limited number of services. On the other hand, a national use might allow for the quicker development of gateways and access to multiple uses. Additionally, localized multiplicity of use for each code would create greater customer confusion and diminish the intrinsic value (memorability and ease of use while travelling) of the codes. In fact, it could be detrimental to the simplicity and memorability of current uses such as 911. It would also be much simpler to effectuate recall, should the Commission decide to do so, if the codes are allocated to fewer applicants or uses. Cox claims that national assignments of N11 numbers are contrary to Bellcore's Numbering Plan.⁴⁰ However, as Cox points out, the Commission cannot delegate its authority over numbering issues to Bellcore.⁴¹ Thus, the Commission should not defer to Bellcore even if it characterizes N11 codes as "local." Additionally, it would be premature to rely on Bellcore's proposed long range numbering plan,⁴² which has not yet been sanctioned by the industry.

Finally, Cox notes that nationwide abbreviated access through 1-0-XXX is already available.⁴³ However, there are current and future alternatives to N11 for local dialing as well.⁴⁴ 1-0-XXX is no more convenient than are the unacceptable current alternatives to N11 for local access to services. Thus, Cox's arguments are unpersuasive.

⁴⁰ Cox at 5.

⁴¹ Cox at Section V.

⁴² North American Numbering Plan Administrator's Report on the future of Numbering in World Zone 1, Bellcore Letter IL-92/01-013 (Jan. 6, 1992) included in Bellcore's January 17, 1992 Reply filing with the Commission in the Petition of the National Association of Regulatory Utility Commissioners, DA 91-1307.

⁴³ Cox at 5.

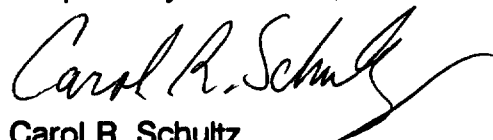
⁴⁴ MCI discussed the LECs' proposed alternatives, above.

Allocation must be nondiscriminatory. MCI shares the concerns of potential users of N11 codes about allowing the LECs to pick any allocation method that they choose.⁴⁵ As Cox demonstrates, for N11 numbers, first-come, first-served is preferable.⁴⁶ MCI agrees with commenters that suggest that the Commission devise a mechanism that would accommodate those who sought abbreviated dialing in the past, rather than set a date after which it would start the clock for numbering requests.⁴⁷ MCI submits that failure to take into account the prior requests for such numbers would be inequitable to those who have been awaiting the allocation of N11 codes for quite some time. Applicants have relied upon the reasonable expectation that the practice in the industry for virtually all code assignments, for example 800 and 900 assignment, i.e. first-come, first-served, would be used for N11 codes. Thus, they should be allocated considering requests that predate the adoption of this order.

CONCLUSION

For the reasons discussed herein, MCI respectfully requests that the Commission require N11 codes to be allocated giving priority to nationwide or ubiquitous uses on a first-come, first-served basis, considering requests that predate the adoption of this order, and initiate a proceeding to require LECs to provide access to abbreviated codes of customers.

Respectfully submitted,



Carol R. Schultz
Its attorney

July 13, 1992

⁴⁵ See, e.g., Newspaper Association of America at 3, Cox at 12-14 (supports first-come, first-served).

⁴⁶ Cox at Section IV.B.

⁴⁷ Pacific Bell and Nevada Bell at 8.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of July, 1992, copies of the foregoing "Reply Comments of MCI, Inc." were served by first class, United States mail, postage prepaid, upon the following parties except where indicated:

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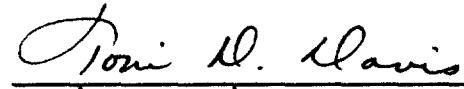
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